

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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TO: Codex Contact Points
Interested International Organizations

FROM: Secretary,
Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme
Viale delle Terme di Caracalla, 00100 Rome, Italy

SUBJECT: Request for comments on a Preliminary Set of Principles on Traceability/Product Tracing

DEADLINE: **21 June 2004**

COMMENTS: To: Copy to:

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BACKGROUND

The 12th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (Brisbane, Australia, December 2003) discussed the subject of traceability/product tracing. The Committee agreed that the Australian Secretariat would prepare a document containing a preliminary set of "Principles on traceability/product tracing", based on the discussion that has occurred over the past two years in the Regional Coordinating Committees, and this document would be circulated for comments through a Circular Letter to all Member countries and international organizations with observer status within Codex.

Furthermore, the Committee agreed, that the Australian Secretariat would prepare a further discussion paper, based on the above document, together with comments received, the outputs and recommendations from seminars and workshops (as appropriate), discussions in the Codex Regional Committee on General Principles and other relevant Codex Committees and Regional Coordinating Committees, and other relevant documents, for circulation and discussion at its next meeting.¹

Governments and interested organizations are reminded that the 20th Session of the Codex Committee on General Principles (2-7 May 2004) will consider the definition of Traceability/Product Tracing of Foodstuffs (CX/GP 04/20/6).

The attached paper, prepared by the Australian Secretariat, summarises relevant discussions on traceability/product tracing in Codex Regional Coordinating Committees and provides a preliminary set of principles as reflected in Annex 1. In developing this preliminary set of principles, the issues raised by the Regional Coordinating Committees have been incorporated where appropriate (these criteria have been included in bold text in the summary for ease of reference).

Governments and international organizations wishing to submit comments on **Annex 1** should do so in writing, preferably by email, to the above addresses **before 21 June 2004**.

¹ ALINORM 04/27/30, paras 72 and 74

Relevant discussion on Traceability/Product Tracing in Codex Regional Coordinating

SUMMARY OF THE KEY POINTS RAISED AT REGIONAL COORDINATING COMMITTEES

1. Following is a summary of the key points from discussions concerning traceability/product tracing within the Regional Coordinating Committees. These key points have been considered in the development of the preliminary set of principles for traceability/product tracing presented in Annex 1
2. The Coordinating Committee for Latin America and the Caribbean², noted the progress made by the *Ad Hoc* Codex Intergovernmental Task Force on Foods derived from Biotechnology in relation to this matter and “generally agreed that **traceability/product tracing could be considered on a case-by-case basis**, but that in many cases there would be better and more effective means of managing food safety risks”. It also pointed out that traceability/product tracing “was not capable in itself of ensuring product safety”. The Committee also noted the problems for developing countries “of **applying traceability/product tracing even for risk management** purposes, particularly the complexity and costs involved”. It pointed out that “these demands could overwhelm the food control systems of small developing countries”³.
3. The Coordinating Committee for Latin America and the Caribbean⁴ were “strongly opposed to the mandatory or regulatory use of traceability/product tracing for purposes other than food safety risk management to protect consumers’ health” and “was of the opinion that it would be premature to consider the development of general guidelines or other texts for the application of traceability/product tracing even for food safety risk management until there was a better understanding of the issues involved, especially terminology”.
4. The Coordinating Committees for Latin America and the Caribbean⁵ “noted that part of the problem of considering traceability/product tracing for ‘ensuring fair trade practices in the food trade’ was that there was considerable lack of clarity on what this expression entailed beyond the prevention of fraudulent practices or preventing deception of the consumer”.
5. The Coordinating Committee for Africa⁶, “stated that traceability/product tracing was a new area and, that as recommended by the Executive Committee, a full debate on the issues could only be undertaken following regional or sub-regional workshops, using case studies, to examine the cost implications of such a system. Without such discussion, the information currently available to many developing Member countries did not allow countries to comment nor to take a position on the issue”.
6. The Coordinating Committee for Africa⁷ recorded a range of individual comments including confining the application of product tracing to a “**one step forward/one step back**” approach for use in the management of food safety risks⁸; the use of traceability/product tracing also in the provision of consumer information⁹; and the benefits for food safety purposes especially where analytical facilities were unable to provide adequate assurance of the absence of contamination of the products concerned¹⁰.
7. Traceability/product tracing has been the focus of considerable discussion among the Codex committees and consensus has not yet been reached on its application.
8. The Coordinating Committee for the Near East ¹¹ stressed “the importance of traceability/product tracing as a food safety measure and for use in certain situations such as the verification of the origin of products, for example gelatin”.

² ALINORM 03/36, para. 55

³ ALINORM 03/36, para. 56

⁴ ALINORM 03/36 paras 58 and 63

⁵ ALINORM 03/36, para. 59

⁶ ALINORM 03/28, para. 117

⁷ ALINORM 03/28 paras 114-118

⁸ ALINORM 03/28 para. 114, Observer from ISDC

⁹ ALINORM 03/28 para. 115, Observer from Consumers International

¹⁰ ALINORM 03/28 para. 118, Delegation of the Republic of Congo

¹¹ ALINORM 03/40, para. 53

9. The Coordinating Committee for Asia¹² recorded considerable discussion concerning the application of traceability/product tracing with the Committee expressing the view that “comprehensive application of traceability would not serve the desired purposes and so it shall be applied strictly **on a case-to-case basis** after taking account all the [following] five criteria...”¹³:

- The nature and extent of risk has to be determined on the basis of specific risk assessment and only after this assessment should a product be considered for traceability;
- It should be demonstrated that traceability was an effective management option for the identified risk and that there was other more cost effective alternative to manage that risk;
- The extent of application of traceability in the food chain should be clearly listed out on the basis of the risk assessment, practical applicability and the cost effectiveness;
- The cost/benefit analysis should be worked out in advance before traceability is considered for a particular product;
- There should be a clear demonstration of the fact that traceability tracing will **not be used as a technical barrier to trade**.

10. The Coordinating Committee for Europe¹⁴ agreed, “that traceability/product tracing **could be used for the purposes of food safety** or as another legitimate objective, for example to ensure the authenticity of the product”, while the Observer from ISDC noted “that industry considers food safety aspects as the main objective of traceability/product tracing. For other elements it needs to be discussed on a **case-by-case basis** to which extent traceability/product tracing might play a role”.

11. The Coordinating Committee for North America and the South West Pacific¹⁵ agreed that “in considering product tracing, Codex should give priority to considering its use as a **tool with respect to risk management**”.

¹² ALINORM 03/15, paras 76-83

¹³ ALINORM 03/15, para. 80

¹⁴ ALINORM 03/19, paras 31-32

¹⁵ ALINORM 03/32, para. 52, b)

PRELIMINARY SET OF PRINCIPLES FOR TRACEABILITY/PRODUCT TRACING

The following preliminary set of principles apply to the application of Traceability/Product Tracing in supporting food inspection and certification systems.

[**Definition** to be developed by Codex Committee on General Principles]

1. Traceability/product tracing is a tool that may be applied within a broader food inspection and certification system as part of a risk management option for meeting specific food safety or fair trading practice objectives.
2. The scope of application and specifications regarding each element of traceability/product tracing, should be considered and clearly justified on a case-by-case basis according to the objective(s) of the food inspection and certification system within which product tracing is implemented.
3. Traceability/Product tracing may be used to:
 - a. Identify a food; and/or
 - b. Record the movement of a food, i.e. from where the food came (1 step back) and to where it was sent (1 step forward); and/or
 - c. If appropriate, inform how the food was changed.
4. Traceability/Product Tracing initiatives utilised within a food inspection and certification system should be:
 - a. Science based
 - b. Consistent with fair trading practices criteria
 - c. Subject to equivalence determinations
 - d. No more trade restrictive than necessary and not be used as a technical barrier to trade
 - e. Take account of the needs of developing countries
 - f. Outcomes based
 - g. Cost effective
 - h. Practical to apply (including being enforceable)